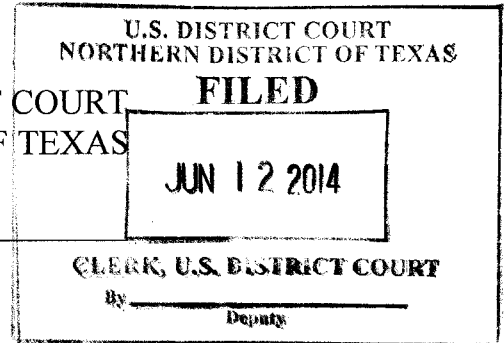


IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

LANDERS MARSHALL ISOM (01)

No. 4:14-MJ-261

**CRIMINAL COMPLAINT**

I, the undersigned Affiant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about May 15, 2014, in the Fort Worth Division of the Northern District of Texas, defendant **Landers Marshall Isom**, being a person who had been convicted in a court of a crime punishable by imprisonment for a term in excess of one year, that is, a felony offense, did knowingly possess in and affecting interstate commerce, the following firearm:

- One (1) Hi-Point, Model C9, 9mm pistol, serial number P1366061
1. Your Affiant, Guillermo F. Gallegos, has been employed as a Special Agent with the ATF assigned to the Dallas Field Division and Special Operations Division since June of 1989. The Affiant's most recent assignment is to the Fort Worth Field Office, beginning in August of 2011. Prior to that, Affiant was employed as a Police Officer with the City of Las Cruces Police Department, Las Cruces, New Mexico.
  2. On May 15, 2014, Affiant received information from Arlington Police Department Narcotics Detective W. Bill that, on the same date, a state search warrant had been served on the residence of H.D. and Landers Marshall Isom at an address in Arlington, Texas. Det. W. Bill advised that pursuant to the state search warrant, firearms and ammunition were recovered in the bedrooms of both H.D. and Isom, along with drugs and drug paraphernalia. At the time the search warrant was executed, there were no additional occupants of the residence and documents were discovered by police indicating that the residence is occupied by H.D. and Isom.

No documents or information were discovered by police indicating that the residence was regularly occupied by other individuals.

3. It was further determined that H.D. and Isom appeared to maintain separate bedrooms and, at the time of the search, H.D. and Isom were found to be the sole occupants of their respective bedrooms.
4. At the time H.D. and Isom were encountered by police during the execution of the search warrant, a firearm was observed by officers to be present in the bedroom of H.D. and a firearm was observed by officers to be present in the bedroom of Isom.
5. Specifically, present in the bedroom of Isom was one (1) Hi-Point, Model C9, 9mm pistol, serial number P1366061, observed next to a magazine with eight (8) rounds of 9mm ammunition lying on the floor on top of a green pair of pants.
6. Det. W. Bill advised that Isom had prior felony convictions. Affiant thereafter confirmed through a review of the criminal history of Isom and by interviewing personnel employed in the Tarrant County District Clerk's Office, that Isom was convicted of attempted murder in 1988 and aggravated robbery in 1996, crimes punishable by imprisonment for a term in excess of one year.
7. On May 22, 2014, Affiant took custody of the aforementioned firearms and ammunition and, based on the Affiant's experience, knowledge, and training and that of other agents employed with the ATF, it was determined that both were not manufactured in the State of Texas and they would have had to cross state lines to have been recovered at the residence in Arlington, Texas.

8. Based upon the foregoing facts and circumstances, Affiant believes that probable cause exists that on May 15, 2014, in the Fort Worth Division of the Northern District of Texas, Isom violated 18 U.S.C. § 922(g)(1).

6/12/2014  
Date

  
Guillermo F. Gallegos

Special Agent

Bureau of Alcohol, Tobacco, Firearms and Explosives

Sworn to before me and subscribed in my presence, 12<sup>th</sup> day of June 2014, at 11:10 am./p.m. in Fort Worth, Texas



JEFFREY L. CURETON

UNITED STATES MAGISTRATE JUDGE